

**PHELAN HALLINAN DIAMOND &  
JONES, LLP**

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Representing Lenders in  
Pennsylvania

Mario J. Hanyon, Esquire

August 26, 2019

JOSEPH H. ELLERMEYER, ESQUIRE  
379 MAIN STREET  
BROOKVILLE, PA 15825

**Re: ERIK E. ROTH AND DEANA R. ROTH A/K/A DEANA R. GASTON  
Bankruptcy No. 19-10232 TPA**

Dear Counselor:

Enclosed please find a true and correct copy of the Amended Notice of Post-Petition Fees, Expenses and Charges regarding the above matter, the original of which has been filed with the Court.

Sincerely yours,

/s/ Mario J. Hanyon, Esquire

Mario J. Hanyon, Esq., Id. No.203993  
Phelan Hallinan Diamond & Jones, LLP  
Omni William Penn Office Tower  
555 Grant Street, Suite 300  
Pittsburgh, PA 15219  
Phone Number: 215-563-7000 Ext 31340  
Fax Number: 215-568-7616  
Email: mario.hanyon@phelanhallinan.com  
Enclosure

cc: ERIK E. ROTH  
DEANA R. ROTH A/K/A DEANA R. GASTON  
RONDA J. WINNECOUR, ESQUIRE (TRUSTEE)  
OFFICE OF THE UNITED STATES TRUSTEE  
CENLAR FSB (EWING, NJ)  
ATTENTION: BANKRUPTCY DEPARTMENT

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. ANY INFORMATION WE OBTAIN WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.

**Fill in this information to identify the case:**

Debtor 1 ERIK E. ROTH

Debtor 2 DEANA R. ROTH A/K/A DEANA R. GASTON  
(Spouse, if filing)

United States Bankruptcy Court for the: WESTERN District of PA  
(State)

Case Number 19-10232 TPA

**Official Form 410S2****Amended Notice of Postpetition Mortgage Fees, Expenses, and Charges**

12/16

If the debtor's plan provides for payment of postpetition contractual installments on your claim secured by a security interest in the debtor's principal residence, you must use this form to give notice of any fees, expenses, and charges incurred after the bankruptcy filing that you assert are recoverable against the debtor or against the debtor's principal residence.

File this form as a supplement to your proof of claim. See Bankruptcy Rule 3002.1.

Name of creditor: UNION HOME MORTGAGE CORP. Court claim no. (if known): 5

Last 4 digits of any number you use to identify the debtor's account: 4848

Does this notice supplement a prior notice of postpetition fees, expenses, and charges?

☒ No.  
☐ Yes. Date of last notice: \_\_\_\_\_

**Part 1: Itemize Postpetition Fees, Expenses, and Charges**

Itemize the fees, expenses, and charges incurred on the debtor's mortgage account after the petition was filed. Do not include any escrow account disbursements or any amounts previously itemized in a notice filed in this case. If the court has previously approved an amount, indicate that approval in parentheses after the date the amount was incurred.

Description	Dates Incurred	Amount
1. Late Charges		(1) \$ _____
2. Non-sufficient funds (NSF) fees		(2) \$ _____
3. Attorney fees	03/27/2019 (Plan Review) 04/01/2019 (Objection to Plan) 05/21/2019 (410A Draft)	\$350.00 \$500.00 \$250.00 (3) _____
4. Filing fees and court costs		(4) \$ _____
5. Bankruptcy/Proof of claim fees	05/21/2019 (POC)	(5) \$300.00 _____
6. Appraisal/Broker's price opinion fees		(6) \$ _____
7. Property inspection fees		(7) \$ _____
8. Tax advances (non-escrow)		(8) \$ _____
9. Insurance advances (non-escrow)		(9) \$ _____
10. Property preservation expenses. Specify: _____		(10) \$ _____
11. Other. Specify: _____		(11) \$ _____
12. Other. Specify: _____		(12) \$ _____
13. Other. Specify: _____		(13) \$ _____
14. Other. Specify: _____		(14) \$ _____

The debtor or trustee may challenge whether the fees, expenses, and charges you listed are required to be paid.  
See 11 U.S.C. § 1322(b)(5) and Bankruptcy Rule 3002.1.

**Part 2: Sign Here**

The person completing this Notice must sign it. Sign and print your name and your title, if any, and state your address and telephone number.

Check the appropriate box.

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.**

**X** /s/ Mario J. Hanyon, Esquire  
Signature

Date August 26, 2019

Print: Mario J. Hanyon, Esq., Id. No.203993  
First Name Middle Name Last Name

Title \_\_\_\_\_

Company Phelan Hallinan Diamond & Jones, LLP

Address 1617 JFK Boulevard, Suite 1400  
Philadelphia, PA 19103

Contact Phone 215-563-7000

Email mario.hanyon@phelanhallinan.co  
m

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
ERIK E. ROTH	:	BK. No. 19-10232 TPA
DEANA R. ROTH A/K/A DEANA R. GASTON	:	
Debtors	:	Chapter No. 13
	:	
UNION HOME MORTGAGE CORP.	:	Document No.
Movant	:	
v.	:	
ERIK E. ROTH	:	
DEANA R. ROTH A/K/A DEANA R. GASTON	:	
Respondents	:	

**ORDER**

**AND NOW**, this       day of       , 2019, upon consideration of the AMENDED NOTICE OF POST-PETITION FEES, EXPENSES AND CHARGES filed by UNION HOME MORTGAGE CORP. (movant) at Document No. \_\_\_\_\_ in the above-captioned bankruptcy case,

It is hereby **ORDERED** that *on or before twenty-one (21) days from the date the Notice of Post-Petition Fees, Expenses and Charges* was docketed, the Debtor(s) or Debtor's counsel shall file, either:

an **AMENDED CHAPTER 13 PLAN**;

a **DECLARATION** that the existing Chapter 13 Plan is sufficient to fund the Plan with the modified debt; or

an **OBJECTION** to the *Amended Notice of Mortgage Payment Change* as stated, following which time the Court will schedule a hearing on the matter.

***The failure to timely file an Objection shall result in the allowance of the post-petition fees, expenses and charges without further order, notice or hearing.***

---

**THOMAS P. AGRESTI,**  
**Bankruptcy Judge**

August 26, 2019

Debtor 1 ERIK E. ROTH

Case Number (if known) 19-10232 TPA

JOSEPH H. ELLERMEYER, ESQUIRE  
379 MAIN STREET  
BROOKVILLE, PA 15825

Debtor 1 ERIK E. ROTH

Case Number (if known) 19-10232 TPA

ERIK E. ROTH  
3450 ROUTE 536  
RINGGOLD, PA 15770

Debtor 1 ERIK E. ROTH

Case Number (if known) 19-10232 TPA

DEANA R. ROTH  
A/K/A DEANA R. GASTON  
3450 ROUTE 536  
RINGGOLD, PA 15770





Phelan Hallinan Diamond &amp; Jones, LLP (PA) / Julia Reyers



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**+ Invoice Information**

**Invoice #:** [REDACTED]  
**Status:** Submitted  
**Servicer:** Cenlar FSB

**Loan #:** [REDACTED]  
**Acquisition Date:**

**Invoice Date:** 5/22/2019  
**Created Date:** 5/22/2019  
**Submitted Date:** 5/22/2019  
**Deadline Date:**

**Invoice Type:** Bankruptcy Services - Chapter 13  
**Vendor Ref #:** [REDACTED]  
**Department:** Bankruptcy  
**Filing State:** Pennsylvania  
**Invoice ID:** [REDACTED]

**Contact:** Eugene Jaskiewicz  
**Loan Type:** VA **ID:** [REDACTED]  
**Borrower:** ROTH ERIK E  
**Address:** 3450 RT 536  
**City, State:** RINGGOLD Pennsylvania  
**Zip:** 15770  
**Property Type:**

**Referral Type:** Bankruptcy

**Submitted** 05/22/2019    **1st Reviewed**    **Last Reviewed**    **Accepted**    **Approved**    **Chk Requested**    **Chk Confirmed**    **Days To Proc** 2

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<b>Fees</b>	Total:	\$550.00	LoanSphere Invoicing \$850.00 Prev. Billed:	Exc. Loan Allow:	Exc. Milestone:	Exc Inv Allw:
<b>Costs</b>	Total:	\$0.00	LoanSphere Invoicing \$0.00 Prev. Billed:	Exc. Loan Allow:		Exc Inv Allw:
				Exc. Loan Total Fees/Costs Allow:		
<b>Totals</b>	<b>Inv Amt:</b>	<b>\$550.00</b>	<b>Prev. Billed: \$850.00</b>	<b>Loan Total Fees/Costs \$850.00</b> <b>Prev. Billed:</b>		<b>Exc Inv Allw:</b>

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N	A	B	I	O	Category	Subcategory	Aff. Ind.	Date	Qty	Price	Billed	Exc. Allow	IPA Status
<a href="#">N</a>		<a href="#">Edit</a>	<a href="#">Delete</a>		Attorney Fees	410A Form		05/21/19	1	\$250.00	\$0.00		
<b>Service From Date:</b> 05/21/2019					<b>Service To Date:</b> 05/21/2019								
<a href="#">N</a>		<a href="#">Edit</a>	<a href="#">Delete</a>		Attorney Fees	Proof of Claim		05/21/19	1	\$300.00	\$0.00		
<b>Service From Date:</b> 05/21/2019					<b>Service To Date:</b> 05/21/2019								



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## + Invoice Information

**Invoice #:** [REDACTED]  
**Status:** Submitted (Exc)  
**Servicer:** Cenlar FSB

**Loan #:** [REDACTED]  
**Acquisition Date:**

**Invoice Date:** 4/2/2019  
**Created Date:** 4/2/2019  
**Submitted Date:** 4/2/2019  
**Deadline Date:**

**Invoice Type:** Bankruptcy Services - Chapter 13  
**Vendor Ref #:** [REDACTED]  
**Department:** Bankruptcy  
**Filing State:** Pennsylvania  
**Invoice ID:** [REDACTED]

**Contact:** Eugene Jaskiewicz  
**Loan Type:** VA **ID:** [REDACTED]  
**Borrower:** ROTH ERIK E  
**Address:** 3450 RT 536  
**City, State:** RINGGOLD Pennsylvania  
**Zip:** 15770  
**Property Type:**

**Referral Type:** Bankruptcy

**Submitted** 04/02/2019    **1st Reviewed**    **Last Reviewed**    **Accepted**    **Approved**    **Chk Requested**    **Chk Confirmed**    **Days To Proc** 2

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<b>Fees</b>	Total:	\$500.00	LoanSphere Invoicing \$350.00 Prev. Billed:	Exc. Loan Allow:	Exc. Milestone:	Exc Inv Allw:
<b>Costs</b>	Total:	\$0.00	LoanSphere Invoicing \$0.00 Prev. Billed:	Exc. Loan Allow:		Exc Inv Allw:
				Exc. Loan Total Fees/Costs Allow:		
<b>Totals</b>	<b>Inv Amt:</b>	<b>\$500.00</b>	<b>Prev. Billed: \$350.00</b>	<b>Loan Total Fees/Costs Prev. Billed: \$350.00</b>		<b>Exc Inv Allw:</b>

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N	A	B	I	O	Category	Subcategory	Aff. Ind.	Date	Qty	Price	Billed	Exc. Allow	IPA Status
N					Attorney Fees	Objection to Confirmation		04/01/19	1	\$500.00	\$0.00		

**Service From Date:** 04/01/2019    **Service To Date:** 04/01/2019



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**+ Invoice Information**

**Invoice #:** [REDACTED]  
**Status:** Submitted  
**Servicer:** Cenlar FSB

**Loan #:** [REDACTED]  
**Acquisition Date:**

**Invoice Date:** 3/28/2019  
**Created Date:** 3/28/2019  
**Submitted Date:** 3/28/2019  
**Deadline Date:**

**Invoice Type:** Bankruptcy Services - Chapter 13  
**Vendor Ref #:** [REDACTED]  
**Department:** Bankruptcy  
**Filing State:** Pennsylvania  
**Invoice ID:** [REDACTED]

**Contact:** Eugene Jaskiewicz  
**Loan Type:** VA **ID:** [REDACTED]  
**Borrower:** ROTH ERIK E  
**Address:** 3450 RT 536  
**City, State:** RINGGOLD Pennsylvania  
**Zip:** 15770  
**Property Type:**

**Referral Type:** Bankruptcy

Submitted	1st Reviewed	Last Reviewed	Accepted	Approved	Chk Requested	Chk Confirmed	Days To Proc
03/28/2019							2

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<b>Fees</b>	Total:	\$350.00	LoanSphere Invoicing \$0.00 Prev. Billed:	Exc. Loan Allow:	Exc. Milestone:	Exc Inv Allw:
<b>Costs</b>	Total:	\$0.00	LoanSphere Invoicing \$0.00 Prev. Billed:	Exc. Loan Allow:		Exc Inv Allw:
				Exc. Loan Total Fees/Costs Allow:		
<b>Totals</b>	<b>Inv Amt:</b>	<b>\$350.00</b>	<b>Prev. Billed: \$0.00</b>	<b>Loan Total Fees/Costs Prev.Billed: \$0.00</b>		<b>Exc Inv Allw:</b>

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N	A	B	I	O	Category	Subcategory	Aff. Ind.	Date	Qty	Price	Billed	Exc. Allow	IPA Status
N					Attorney Fees	Review of Plan		03/27/19	1	\$350.00	\$0.00		

**Service From Date:** 03/27/2019 **Service To Date:** 03/27/2019